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U.S. Patent Application No. 10/816,640  
Attorney Docket No. 352003-991340REMARKS

Examiner has indicated that claims 5, 7-9, 16, and 18 are allowable if rewritten in independent form, including all the limitations of the base claims and any intervening claims. Claims 5, 7, 16, and 18 have been so rewritten, and are thus now in allowable form. Claims 8-9 depend from now-rewritten claim 7, and are thus also now in allowable form.

The Claim Rejections

Claims 1-4, 6, 10-15, 17, and 19-20 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,493,856 to *Usami et al.* ("*Usami*"). Applicants respectfully traverse, noting that *Usami* does not disclose every element of the claims as amended. More specifically, *Usami* does not disclose the generation of a layout such that an electric potential of a virtual ground line does not exceed an upper limit electric potential.

At most, *Usami* only discloses generation of circuits that reduce leakage current (e.g., Abstract; Col. 6:21-34). *Usami* does this by replacing transistors having high threshold voltages (H-V<sub>th</sub>) with multi-threshold (MT) cells, in various circuits (e.g., Col. 3:14-18; 6:21-34). This is entirely different from generating layouts having upper limits on the electric potential of their virtual ground lines. In fact, *Usami* does not mention virtual ground lines at all.

Accordingly, claims 1, 13, and 20 are patentable over *Usami* for at least the reason that they recite generation of a layout "such that an electric potential of the virtual ground line does not exceed the upper limit electric potential . . . ." The remaining rejected claims depend from one of claims 1, 13, or 20, and are thus also patentable for at least this same reason.

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CONCLUSION

In view of the above, it is respectfully submitted that Claims 1-20 are now in condition for allowance.

The Examiner is invited to call Applicant's attorney at the number below in order to speed the prosecution of this application.

The Commissioner is authorized to charge any deficiencies in fees and credit any overpayment of fees to Deposit Account No. 07-1896 referencing Attorney Docket No. 352003-991340.

Respectfully submitted,

**DLA PIPER US LLP**

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By

  
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